

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ABRAHAM KLEINMAN,

Plaintiff,

v.

ROC CAPITAL HOLDINGS LLC,  
CHAIM PORGES, and HELENA  
PORGES,

Defendants.

Case No. 1:22-cv-2566-ALC

**REQUEST FOR CERTIFICATE OF  
DEFAULT AS TO DEFENDANTS  
CHAIM PORGES AND HELENA  
PORGES**

Pursuant to Fed. R. Civ. P. 55(a), plaintiff Abraham Kleinman requests a Clerk's certificate of default against defendants Chaim Porges and Helena Porges. As set forth in the accompanying declaration of Moshe O. Boroosan, Esq., the parties against whom the judgment is sought: (i) are not infants or incompetent persons; (ii) are not in the military service; (iii) were properly served under Fed. R. Civ. P. 4 and proof of service was duly filed with the Court; and (iv) have defaulted in appearing in the above-captioned action.

DATED: April 24, 2022

**LAW OFFICES OF MOSHE BOROOSAN, P.C.**

*/s/ Moshe O. Boroosan*

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